

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**HANNAH CRAMER, et al.,**

**Plaintiffs,**

**v.**

**ARKESIA, INC. d/b/a CLUB ROUGE, et al.,**

**Defendants.**

**Case No. 3:18-cv-00039**

**JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT  
AND DISMISSAL OF PLAINTIFF’S AMENDED COMPLAINT WITH PREJUDICE**

COMES NOW Plaintiffs Hannah Cramer, Jessica Blakley, Shernell Crutchfield, and Opt-In Plaintiffs (collectively “Plaintiffs”) and Defendants Arkesia, Inc. d/b/a/ Club Rouge, Circle 2, Inc. d/b/a Daddy Rabbits, Circle 2, Inc. d/b/a Candy Bar, Imaginary Images, Inc. d/b/a Paper Moon, BTF3 LLC d/b/a Papermoon, M.G.B., Inc. d/b/a Pure Pleasure, William Andreas Pyliaris, and and/or any other entities affiliated with or controlled by Arkesia, Inc. d/b/a/ Club Rouge, Circle 2, Inc. d/b/a Daddy Rabbits, Circle 2, Inc. d/b/a Candy Bar, Imaginary Images, Inc. d/b/a Paper Moon, BTF3 LLC d/b/a Papermoon, M.G.B., Inc. d/b/a Pure Pleasure, and William Andreas Pyliaris (collectively “Defendants”) (collectively “Parties”), jointly move the Court for an order approving the agreements between the parties to resolve this case and dismissing Plaintiff’s Amended Complaint with prejudice.

**Respectfully submitted,**

**HANNAH CRAMER, JESSICA BLAKLEY,  
SHERNELL CRUTCHFIELD, AND OPT-IN  
PLAINTIFFS**

/s/

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/s/

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**COUNSEL FOR PLAINTIFFS**

and

**ARKESIA, INC. D/B/A CLUB ROUGE,  
CIRCLE 2, INC. D/B/A DADDY RABBITS,  
CIRCLE 2, INC. D/B/A CANDY BAR,  
IMAGINARY IMAGES, INC. D/B/A PAPER  
MOON, BTF3, INC. D/B/A PAPERMOON,  
MGB., INC. D/B/A PURE PLEASURE,  
AND/OR ANY OTHER ENTITIES  
AND WILLIAM ANDREAS PYLIARIS**

/s/

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**Certificate of Service**

I hereby certify that on September 27, 2018, I will electronically file the foregoing JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT AND DISMISSAL OF PLAINTIFF'S AMENDED COMPLAINT WITH PREJUDICE with the Clerk of Court using the CM/ECF system which then send a notification of such filing (NEF) to opposing counsel as follows:

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\_\_\_\_\_/s/\_\_\_\_

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